

**Consultation Response from KC Lead Local Flood Authority**
**2019/90443 316, Middle Road, Earlsheaton, Dewsbury, WF12 8BT**
**Erection of extensions and alterations to 2 dwellings to create 9 flats, erection of external terrace and formation of parking area**
**Date Responded:  
05/04/2019**
**Responding Officer:  
Aleksandra Tomczyk**
**Responding Ref: 0**
**Summary**
**Kirklees Flood Management and Drainage as the Lead Local Flood Authority OBJECT to this planning application as no surface water drainage or flood risk information was provided.**
**We also provide the below additional comments.**
**Additional Comments**

The applicant seeks permission for erection of extensions and alterations to 2 dwellings, to create 9 flats.

**Flood Risk**

Flood risk to the proposed development and the potential impact of the development on flood risk elsewhere is not considered. It is important that flood risk from all sources (watercourse, surface water, reservoirs etc.) is assessed and considered with the design. This should ensure that through the delivery of the scheme, any potential adverse impacts on flood risk is managed and not increased elsewhere.

The proposed development is located within Environment Agency Flood Zone 1 and therefore it is not anticipated that the site would be impacted from main river or tidal flooding.

Kirklees LLFA do not have any records of flood impacting the site or the immediate vicinity. However, it should be noted that a lack of records does not mean that flooding has not occurred simply that we don't hold records of flooding occurring.

**Drainage**

In order to overcome this objection, the applicant is required to provide the following information in a form of a drainage strategy:

- Assessment of surface water discharge hierarchy;
  - o Infiltration – Kirklees LLFA records suggest that this location is not suitable for infiltration features. Additionally, considering the steep slopes in the area, infiltration features may not be suitable, given the potential for re-emergence and impacts on ground stability.
  - o Watercourse – Kirklees LLFA records do not show any watercourse proximal to the proposed development, however, the applicant and their technical advisors should consider old or redundant infrastructure that may not be recorded.
  - o Sewer – Kirklees LLFA records show a surface water sewer running north west from the back of the existing properties (number 316 and 318). If the applicant wishes to make a connection to this sewer, they should contact Yorkshire Water to determine the feasibility of this connection. For a new connection to an existing system, the applicant is required to restrict discharges back to greenfield equivalent runoff rates. This may require attenuation.
- The applicant is required to provide a proposed discharge point and discharge rate to this receiving body;
- Sizing and location of any attenuation features;
- Change of the impermeable area between the existing and proposed scheme; and

- Flow routing through the site and from the attenuation, in case of an exceedance event.

Kirklees LLFA highlight that this application is to modify an existing functioning site, therefore constitutes and brownfield development, therefore a minimum 30% reduction in surface water discharge is required, unless a justification is made for a higher rate. Evidence is needed as to why the proposed discharge is the lowest possible. This is on the basis that an existing and functional connection to a drainage system is present and that surface water drainage infrastructure for the site is also functional. The applicant is required to demonstrate that this is the case prior to proposing an elevated discharge rate.